

YOUNG CONAWAY STARGATT & TAYLOR, LLP

BRUCE M. STARGATT
BEN T. CASTLE
SHELDON N. SANDLER
RICHARD A. LEVINE
RICHARD A. ZAPPA
FREDERICK W. IOBST
RICHARD H. MORSE
DAVID C. MCBRIDE
JOSEPH M. NICHOLSON
CRAIG A. KARSNITZ
BARRY M. WILLOUGHBY
JOSY W. INGERSOLL
ANTHONY G. FLYNN
JEROME K. GROSSMAN
EUGENE A. DIPRINZIO
JAMES L. PATTON, JR.
ROBERT L. THOMAS
WILLIAM D. JOHNSTON
TIMOTHY J. SNYDER
BRUCE L. SILVERSTEIN
WILLIAM W. BOWSER
LARRY J. TARABICOS
RICHARD A. DILIBERTO, JR.
MELANIE K. SHARP
CASSANDRA F. ROBERTS

RICHARD J.A. POPPER
TERESA A. CHEEK
NEILLI MULLEN WALSH
JANET Z. CHARLTON
ROBERT S. BRADY
JOEL A. WAITE
BRENT C. SHAFFER
DANIEL P. JOHNSON
CRAIG D. GREAR
TIMOTHY JAY HOUSEAL
BRENDAN LINEHAN SHANNON
MARTIN S. LESSNER
PAULINE K. MORGAN
C. BARR FLINN
NATALIE WOLF
LISA B. GOODMAN
JOHN W. SHAW
JAMES P. HUGHES, JR.
EDWIN J. HARRON
MICHAEL R. NESTOR
MAUREEN D. LUKE
ROLIN P. BISSELL
SCOTT A. HOLT
JOHN T. DORSEY
M. BLAKE CLEARY

THE BRANDYWINE BUILDING
1000 WEST STREET, 17TH FLOOR
WILMINGTON, DELAWARE 19801

P.O. Box 391
WILMINGTON, DELAWARE 19899-0391

(302) 571-6600
(800) 253-2234 (DE ONLY)
FAX: (302) 571-1253

110 WEST PINE STREET
P.O. Box 594
GEORGETOWN, DELAWARE 19947
(302) 856-3571
(800) 255-2234 (DE ONLY)

FAX: (302) 856-9338

WWW.YOUNGCONAWAY.COM

DIRECT DIAL: 302-571-6651
DIRECT FAX: 302-576-3319
rmorse@ycst.com

ATHANASIOS E. AGELAKOPOULOS
JOSEPH M. BARRY
SEAN M. BEACH
DONALD J. BOWMAN, JR.
TIMOTHY P. CAIRNS
CURTIS J. CROWTHER
MARGARET M. DIBIANCA
ERIN EDWARDS
KENNETH J. ENOS
IAN S. FREDERICKS
JAMES J. GALLAGHER
DANIELLE GIBBS
ALISON G.M. GOODMAN
SEAN T. GREECHER
KARA S. HAMMOND
STEPHANIE L. HANSEN
DAWN M. JONES
RICHARD S. JULIE
KAREN E. KELLER
JENNIFER M. KINKUS
EDWARD J. KOSMOWSKI

SPECIAL COUNSEL
JOHN D. MCCLAUGHLIN, JR.
ELENA C. NORMAN (NY ONLY)
PATRICIA A. WIDDOSS

JOHN C. KUFFEL
TIMOTHY E. LENGKEEK
MATTHEW B. LUNN
JOSEPH A. MALFITANO
ADRIA B. MARTINELLI
MICHAEL W. MCDERMOTT
MARIBETH L. MINELLA
EDMON L. MORTON
D. FON MUTTAMARA-WALKER
JENNIFER R. NOEL
JOHN J. PASCHETTO
ADAM W. POFF
SETH J. REIDENBERG
FRANCIS J. SCHANNE
MICHELE SHERRETTA
MICHAEL P. STAFFORD
JOHN E. TRACEY
MARGARET B. WHITEMAN
CHRISTIAN DOUGLAS WRIGHT
SHARON M. ZIEG

OF COUNSEL
STUART B. YOUNG
EDWARD B. MAXWELL, 2ND

September 19, 2005

BY HAND DELIVERY

The Honorable Gregory M. Sleet
United States District Court
844 North King Street
Wilmington, DE 19801

The Honorable Kent A. Jordan
United States District Court
844 North King Street
Wilmington, DE 19801

Re: Kimball v. MBNA Corp., et al., Case No. 1:05-cv-643-KAJ
McMath v. MBNA Corp., et al., Case No. 1:05-cv-644-KAJ

Dear Judge Sleet and Judge Jordan:

I am local counsel for defendants in the two above-captioned cases, which were recently transferred to this Court from the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404(a). I write regarding the judicial assignment of those cases to Judge Jordan.

These two cases are putative class actions brought on behalf of MBNA shareholders under federal securities law. There are seven other virtually identical actions already pending in this Court that assert the same claims and that were brought on behalf of the same putative class. Indeed, these two cases were transferred to this Court from New York as a direct result of the pendency of these other actions. The seven virtually identical cases, all assigned to Judge Sleet, are:

Baker v. MBNA Corp., et al., Case No. 1:05-cv-00272-GMS;
Phillips v. MBNA Corp., et al., Case No. 1:05-cv-00277-GMS;
Wilkins v. MBNA Corp., et al., Case No. 1:05-cv-00287-GMS;
Bronstein v. MBNA Corp., et al., Case No. 1:05-cv-00289-GMS;
Penn v. MBNA Corp., et al., Case No. 1:05-cv-00293-GMS;

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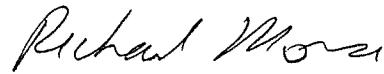
The Honorable Kent A. Jordan

Jones v. MBNA Corp., et al., Case No. 1:05-cv-00316-GMS;
Blum v. MBNA Corp., et al., Case No. 1:05-cv-00372-GMS

Currently pending before Judge Sleet is an unopposed motion to consolidate these seven actions and appoint lead plaintiff and lead counsel pursuant to federal securities law. The parties also recently filed in those actions a stipulation setting forth an agreed-upon schedule for the filing of a consolidated amended complaint and responsive pleadings.

I write to ask Your Honors to consider having the two cases that have been assigned to Judge Jordan reassigned to Judge Sleet so that they ultimately can be consolidated with the seven virtually identical putative class actions pending before Judge Sleet.

Respectfully yours,



Richard H. Morse (No. 531)

RHM:mmeeh

cc: Clerk of the Court (By E-filing)
Jeffrey Goddess, Esquire (By Hand)
Seth D. Rigrodsky, Esquire (By Hand)
A. Zachary Naylor, Esquire (By Hand)
Curtis V. Trinko, Esquire
Maria Alba, Jr., Esquire
Mary K. Blasy, Esquire
Andrei Rado, Esquire
Joseph N. Gielata, Esquire
Alfred G. Yates, Jr., Esquire
Richard C. Pepperman, II, Esquire (By E-mail)